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Proposed Counsel for Debtors

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

In re: J&K WRIGHT FAMILY LIMITED PARTNERSHIP, a Utah limited partnership; CARLTON HOTEL LLC, a Utah limited liability company; and CEDAR CITY INN LLC, a Utah limited liability company, Debtors.	Case Nos. 10-36784; 10-36787; 10-36790 Chapter 11 Judge _____ [Filed Electronically]
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**MOTION FOR ORDER
AUTHORIZING THE JOINT ADMINISTRATION OF RELATED
CASES UNDER BANKRUPTCY RULE 1015(b) AND LOCAL RULE 1015-1**

J&K Wright Family Limited Partnership (“J&K”), Carlton Hotel LLC (“Carlton”), and Cedar City Inn LLC (“Cedar City Inn”), debtors in the above captioned cases (collectively, the “Debtors”) hereby move this Court (this “Motion”) for entry of an order pursuant to Federal Rule of Bankruptcy Procedure 1015(b) and Local Rule 1015-1 authorizing the joint administration of their chapter 11 cases and, in connection herewith, the Debtors respectfully state as follows:

This Motion is based on the points and authorities below, the evidence contained in the “Declaration Of James D. Wright In Support Of Certain First Day Motions” filed concurrently

herewith, and the arguments, evidence and representations that may be presented at or prior to any hearing on this Motion.

I. RELIEF REQUESTED

1. Pursuant to Local Rule 1015-1, the Debtors request the joint administration of their cases with respect to administrative matters only, including a joint pleading docket, a joint pleading caption, combined notices to creditors and other administrative matters. The Debtors do not request substantive consolidation of the Debtors' estates at this time.

2. The Debtors propose that all pleadings relating to their cases shall bear a joint caption in the form of Exhibit A attached hereto, and that the Court clerk file and maintain all pleadings under a single pleading docket for all of the Debtors' cases.

3. No previous request for the relief sought herein has been made to this Court.

II. BACKGROUND

A. The Chapter 11 Filings.

4. On December 3, 2010 (the "Petition Date"), the Debtors filed voluntary petitions and thereby commenced their chapter 11 cases (the "Cases").

5. No Trustee or creditors' committee has been appointed in the Cases.

6. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

B. Property and Operations of the Debtors.

7. J&K is a holding company that owns 100% of the membership interests in Carlton and Cedar City Inn which, in turn, directly own and operate the Hotels (as defined below). J&K is owned by the following individuals: James D. and Karen C. Wright and their

children, James D. Wright Jr., Jason C. Wright, Joshua J. Wright and Jonathan S. Wright.¹

8. Carlton owns and operates The Carlton Hotel, located at 140 and 150 E. South Temple, Salt Lake City, Utah ("The Carlton"), and Cedar City Inn owns and operates the Quality Inn, located at 250 N. 1100 W., Cedar City, Utah (the "Quality Inn"). (The Carlton and the Quality Inn are sometimes referred to collectively as the "Hotels" and individually as a "Hotel").

III. BASIS FOR RELIEF

9. There is no specific provision in the Bankruptcy Code governing the joint administration of cases. Bankruptcy Rule 1015(b) and Local Rule 1015-1, however, authorize joint administration when two or more related debtor entities have filed for protection under the Bankruptcy Code.

10. Bankruptcy Rule 1015(b) and Local Rule 1015-1 promote the fair and efficient administration of related cases of affiliated debtors, while ensuring that no rights of individual creditors are unduly prejudiced. See, e.g., 9 Collier on Bankruptcy ¶ 1015.03 at 1015-6 (15th ed. rev. 2005). Courts have liberally allowed joint administration of related cases to promote procedural convenience and cost efficiencies. See, e.g., In re Cooper, No. 02-03566, 2003 Bankr. LEXIS 360, at *5 (Bankr. N.D. Iowa 2003) (holding, where there was "substantial overlap" in the cases, that "joint administration is appropriate to handle [the] cases in the most convenient and cost saving manner possible").

11. Joint administration is appropriate in this case for of the following reasons:

a. The Debtors are closely related business entities and affiliates;

¹ James D. Wright Sr. has a 2% General Partner and a 40.536% Limited Partner interest; Karen C. Wright has a .5% General Partner interest and a 36% Limited Partner interest; James D. Wright Jr. has a 5.241% Limited Partner interest; Jason C. Wright has a 5.241% Limited Partner interest; Joshua J. Wright has a 5.241% Limited Partner interest; and Jonathan S. Wright has a 5.241% Limited Partner interest.

b. Carlton and Cedar City Inn are managed and wholly owned by J&K;

c. The Debtors are all impacted by loan obligations to Zions First National Bank ("Zions"). To finance operation of the Hotels, J&K, James D. and Karen C. Wright entered into loan agreements (the "Zions Loans") with Zions. Carlton and Cedar City Inn each pledged, by deed of trust, their respective Hotel as security for the Zions Loans.

d. There is overlap in the Debtors' creditors.

e. Joint administration of the Cases would provide each creditor with notice of all matters relating to all of the Debtors, thereby insuring that creditors are informed of all matters potentially affecting their claims.

12. Joint administration will reduce the cost of administering the Cases and would eliminate the waste, unnecessary paperwork, duplication, and potential confusion that may otherwise be created by maintaining separate pleading dockets for these related cases. Most motions and other pleadings filed in these cases will concern all of the Debtors. If such motions (and the related responses and other pleadings) were required to be filed separately in each Debtor's case, it is likely that the only material differences among each set of pleadings would be the caption. Thus, requiring each Debtor to file separate pleadings in each matter would entail considerable duplication and additional paperwork at substantial cost, without generating any additional benefit to creditors.

13. Joint administration of the Cases will also benefit creditors, because creditors who respond to motions affecting most or all of the Debtors, or who file their own motions affecting most or all of the Debtors, will not be required to prepare and file multiple sets of papers that may be identical except for the captions.

WHEREFORE, the Debtors respectfully request that the Court enter the order attached hereto as Exhibit B authorizing joint administration of the Cases.

DATED: December 3, 2010

/s/Danny C. Kelly

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Proposed Counsel for Debtors

EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

<p>In re:</p> <p>J&K WRIGHT FAMILY LIMITED PARTNERSHIP, a Utah limited partnership, <u>et al.</u>,</p> <p>Debtors.</p>	<p>Case No. 10-36784</p> <p>Jointly Administered with Case Nos. 10-36787 and 10-36790 Chapter 11</p> <p>Judge _____</p> <p>[Filed Electronically]</p>
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EXHIBIT B

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<p>In re:</p> <p>J&K WRIGHT FAMILY LIMITED PARTNERSHIP, a Utah limited partnership; CARLTON HOTEL LLC, a Utah limited liability company; and CEDAR CITY INN LLC, a Utah limited liability company,</p> <p style="text-align: center;">Debtors.</p>	<p>Case Nos. 10-36784; 10-36787; 10-36790</p> <p>Chapter 11</p> <p>Judge _____</p> <p>[Filed Electronically]</p> <p>Hearing Date, Time and Location:</p> <p>_____, _____</p> <p>Courtroom _____</p> <p>Frank E. Moss U.S. Courthouse 350 South Main Street, 3rd Floor Salt Lake City, Utah</p>
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**ORDER GRANTING MOTION FOR ORDER AUTHORIZING
THE JOINT ADMINISTRATION OF RELATED CASES UNDER
BANKRUPTCY RULE 1015(b) AND LOCAL RULE 1015-1**

The "Motion for Order Authorizing the Joint Administration of Related Cases Under Bankruptcy Rule 1015(b) and Local Rule 1015-1" (the "Joint Administration Motion"), filed on December 3, 2010 by J&K Wright Family Limited Partnership; Carlton Hotel LLC; and Cedar City Inn LLC (collectively, the "Debtors"), came on for hearing before the Honorable _____ on _____, at _____. Appearances were made as noted in the record of the hearing.

Having read and considered the Joint Administration Motion, the "Declaration of James D. Wright in Support of Certain First Day Motions" in support thereof, and having considered the other matters submitted to the Court in connection with the Joint Administration Motion; and it appearing that the limited notice given of the Joint Administration Motion was appropriate under the particular circumstances presented; and good cause appearing, it is hereby ordered that:

1. The Joint Administration Motion is granted;
2. The Debtors' bankruptcy cases shall be jointly administered under the lowest docket number of the Debtors' three cases, which is Case Number 10-36784;
3. The Honorable _____, who is the Judge assigned to Case Number 10-_____, shall retain the assignment of the jointly administered cases;
4. All pleadings, other than proofs of claim, relating to the Debtors' cases shall bear a joint caption, substantially in the form of Exhibit A attached hereto, and shall be maintained by the court clerk under a single pleading docket.

DATED: _____
HONORABLE _____
UNITED STATES BANKRUPTCY JUDGE

Presented By:

/s/ Danny C. Kelly

Danny C. Kelly

Bentley R. Peay

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Proposed Counsel for Debtors

Approved as to form:

EXHIBIT A

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FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

<p>In re:</p> <p>J&K WRIGHT FAMILY LIMITED PARTNERSHIP, a Utah limited partnership, <u>et al.</u>,</p> <p>Debtors.</p>	<p>Case No. 10-36784</p> <p>Jointly Administered with Case Nos. 10-36787 and 10-36790</p> <p>Chapter 11</p> <p>Judge _____</p> <p>[Filed Electronically]</p>
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